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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

MICQUEL R. BINGHAM,
Defendant.

Case: 4:23-cr-20473
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 08-16-2023
INDI USA v. Micquel Bingham (tt)

Violations:

18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(k)
18 U.S.C. § 922(o)
18 U.S.C. § 933(a)(1)

INDICTMENT

F I L E D
AUG 16 2023
U.S. DISTRICT COURT
FLINT, MICHIGAN

THE GRAND JURY CHARGES:

COUNT ONE
FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)

On or about March 13, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Raven Arms, Model MP-25, .25 caliber, semi-automatic pistol, with an obliterated serial number, and a Springfield, Model XDM-45, .45 caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

**POSSESSION OF A FIREARM WITH AN OBLITERATED SERIAL NUMBER
18 U.S.C. § 922(k)**

On or about March 13, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM knowingly possessed a firearm, that is, a Raven Arms, Model MP-25, .25 caliber, semi-automatic pistol, that had been shipped and transported in interstate commerce, from which the manufacturer's serial number had been removed, altered and obliterated, in violation of Title 18, United States Code, Section 922(k).

COUNT THREE

**FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)**

On or about April 26, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Pioneer Arms, Model Hellpup, 7.62x39mm caliber, AK-47 style semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR
FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)

On or about May 19, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Glock, Model 23, .40 caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE
ILLEGAL POSSESSION OF A MACHINEGUN
18 U.S.C. § 922(o)

On or about May 19, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM knowingly possessed a machinegun, that is, a Glock, Model 23, .40 caliber pistol, modified with a conversion device that converted the firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

COUNT SIX
ILLEGAL TRAFFICKING IN FIREARMS
18 U.S.C. § 933(a)(1)

On or about May 19, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM knowingly shipped, transported, transferred, caused to be transported, or otherwise disposed of a firearm, that is, a Glock, Model 23, .40 caliber pistol,

modified to function as a machinegun, to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT SEVEN
ILLEGAL POSSESSION OF A MACHINEGUN
18 U.S.C. § 922(o)

On or about June 1, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM knowingly possessed a machinegun, that is, two machinegun conversion devices, also known as “Glock switches,” a part designed and intended solely and exclusively to convert a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

COUNT EIGHT
ILLEGAL TRAFFICKING IN FIREARMS
18 U.S.C. § 933(a)(1)

On or about the June 1, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM knowingly shipped, transported, transferred, caused to be transported, or otherwise disposed of a firearm, that is, two machinegun conversion devices, also known as “Glock switches,” to Individual-1 in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or

possession of the firearm by Individual-1 would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(1).

COUNT NINE
FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)

On or about June 29, 2023, in the Eastern District of Michigan, MICQUEL R. BINGHAM, knowing he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Smith & Wesson, model M&P 15, .223 caliber, semi-automatic rifle, and an FNH USA, LLC, Model FNS-9, 9mm caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS
18 U.S.C. § 924(d)(1)

The allegations contained in Counts One through Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).

Upon conviction of an offense charged in Counts One through Seven, MICQUEL R. BINGHAM shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense including, but not limited to:

- a. a Raven Arms, Model MP-25, .25 caliber, semi-automatic pistol, with an obliterated serial number;
- b. a Springfield, Model XDM-45, .45 caliber, semi-automatic pistol, serial number MG669902;
- c. a Pioneer Arms, Model Hellpup, 7.62x39mm caliber, AK-47 style semi-automatic pistol, serial number PAC1132846;
- d. a Glock, Model 23, .40 caliber pistol, serial number BXSF042;
- e. two machinegun conversion devices, also known as “Glock switches;”
- f. a Smith & Wesson, model M&P 15, .223 caliber, semi-automatic rifle, serial number TS41118; and
- g. an FNH USA, LLC, Model FNS-9, 9mm caliber, semi-automatic pistol, GKH0093157.

THIS IS A TRUE BILL.

Dated: August 16, 2023

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ANTHONY P. VANCE

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Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Co**

Case: 4:23-cr-20473

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis

Filed: 08-16-2023

INDI USA v. Micquel Bingham (tt)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

Companion Case Information		Companion Case Number: 23-CR-20414
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned: F. KAY BEHM
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		AUSA's Initials: TV

Case Title: USA v. MICQUEL R. BINGHAM**County where offense occurred :** GENESEE**Check One:** **Felony** **Misdemeanor** **Petty** Indictment/ Information --- **no** prior complaint. Indictment/ Information --- based upon prior complaint [Case number: 23-mj-30312] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

8/16/2023

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.